

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CRYSTAL SEAMAN,

PLAINTIFF,

VS.

FOOD GIANT SUPERMARKETS, INC.,

DEFENDANT.

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CASE NO. 2:05-CV-414-T

PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST SET
OF INTERROGATORIES AND REQUEST FOR PRODUCTION

COMES NOW, the Plaintiff, Crystal Seaman, and by and through her undersigned and hereby submits her Response to the Defendant's First Set of Interrogatories and Request for Production of Documents, stating as follows:

INTERROGATORIES

1. Please state your name, date of birth, social security number and home address.

RESPONSE:

Crystal DeAndrea Seaman

DOB: 03/09/1970

SSN: 236-15-0086

Address: 28045 Beulah Church Road
Opp, Alabama 36467

2. State you address and place of residence for the twenty (20) years preceding the filing of these interrogatories.

RESPONSE:

2003-present: 28045 Beulah Church Road
Opp, Alabama 36467

2001-2003: 783 Gopher Ridge Road
Samson, Alabama 36477

1999-2001: Hartford, Alabama

1987-1989 and 1991-1999: Star Route 1, Box 70
Palatka, Florida

3. If you or any member of your immediate family has ever filed or been involved in any other lawsuit, claim for damages as a party or a witness, state the nature of the claim, the location of the court, the name of the attorneys, and the final result?

RESPONSE:

Robert Seaman, my husband, filed for worker's compensation benefits in September, 2002 because he was injured on the job. The case did not go to court and was settled last year.

RESPONSE:

I walked out of the door of the grocery store. There is a ramp for ease of rolling buggies down. I rolled my buggy down the ramp toward the vehicle where my husband sat waiting for me. At the end of the ramp, my buggy got caught in a hole causing the buggy to jar and lift up on its end. I fell partially over the buggy and hurt my arm. I continued to the vehicle where my husband was parked, and he asked me what was wrong with my arm. I explained what happened to him.

5. *As to the condition which you contend cause the accident, state:*

(a) *A description of the condition you allege made the premises dangerous;*

RESPONSE:

There was a hole at the of the ramp which the wheels of a buggy could get caught in and stop abruptly or turn sharply causing someone to injure themselves.

(b) *Each fact which indicates the length of time the condition had existed prior to the accident;*

RESPONSE:

On the day of the incident, I believe there was a carpet rolled up and placed off to the side of the ramp. I visit this store frequently and normally there is a carpet over this particular place.

(c) *Each fact which tends to show that the defendant knew, or should have known, of the condition;*

RESPONSE:

I visit this store frequently and normally there is a carpet over this particular place. When I visited the store again, two weeks later, the carpet was placed over the hole.

(d) *Each act which the defendant failed to perform to make the premises reasonably safe for use;*

RESPONSE:

The defendant should have patched the hole, or made it where customers leaving the store would not catch the wheels of the store's buggies in the hole causing people to injure themselves.

(e) *The time that you first became aware of such condition.*

RESPONSE:

At the time of the incident.

6. *State the name and address of your last five employers in chronological order.*

RESPONSE:

06/2004-03/2005:	Northport Health Service 115 East Paulk Avenue Opp, Alabama 36467
10/2001-07/2002:	TomThumb #89 1300 East 5th Avenue Floral, Alabama
2000:	BP Hartford, Alabama 36344

Charles W. Blakeney
Charles W. Blakeney, BLA068
Attorney for Plaintiff
Post Office Box 100
Geneva, Alabama 36340
334-684-2387

**STATE OF ALABAMA,
COUNTY OF GENEVA.**

Before me, the undersigned authority, a Notary Public in and for said County, in s personally appeared **Crystal Seaman**, who being by me first duly sworn, deposes and says follows:

My name is **Crystal Seaman** and I am the Plaintiff in the above styled cause. I ha over the allegations of the Answer to Defendant's First Set of Interrogatories and Request Production as prepared by my attorney, and the allegations set forth therein are true and cc according to my information, knowledge, and belief.

Crystal Seaman
Crystal Seaman

Sworn to and subscribed before me this 24 day of June, 200

Amanda L. Moore

Notary Public

My commission expires: 8/31/200

CERTIFICATE OF SERVICE

I hereby certify that on the 24 day of June, 2005, I served a and correct copy of the foregoing upon Hon. M. Warren Butler, Hon. Richard Brantley Johnson, United States Mail, with postage prepaid and addressed as follows, and upon Hon. David J. via hand delivery:

Hon. M. Warren Butler
Hon. Richard Brantley Johnson
LYONS, PIPES & COOK, P.C.
Post Office Box 2727
Mobile, Alabama 36652

Charles W. Blakeney